

Claims 1-23 are pending in this application, with Claims 1, 17, 19, and 22 being independent.

Claims 1-11 and 16-23 are rejected under 103(a) as being obvious over Usami (USP 6,785,814) in view of Hamada (USP 4,864,108). Claims 12-15 are rejected under 103(a) as being obvious over Usami and Hamada in further combination with Ito (U.S. Publication No. 2001/0013097 A1). Applicant respectfully traverses these rejections for the following reasons.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of adding additional information to image data to generate information-added data and encrypting the information-added data to make it difficult to detect that the additional information is added. With these features, it is difficult to detect the presence and position of the additional information in the image data and, therefore, it is difficult for a malicious person to tamper with the additional information.

Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features. Usami discloses that supplementary information is embedded in original image data *after* the supplementary information is encrypted, as described at lines 37-40 of column 5 and lines 55-62 of column 10. Thus, according to that patent, only the supplementary information is encrypted and the original image data is not encrypted.

The Examiner asserts that Hamada discloses the feature of encrypting information-added data to make it difficult to detect that the additional information is added. The Examiner further asserts that it would have been obvious to combine the teachings of Hamada with the system of Usami because “the combination of separate data which are then encrypted together allows a facility, such as a bank, to store the combined,

secured data for retrieval purposes in case of an intrusion.” Applicant respectfully disagrees.

Applicant submits that Hamada does not disclose or suggest encrypting information-added formed by adding additional information to image data. Instead, Hamada discloses that a signal Z of image data including, for example, a face is encrypted by an encryption means 105 *based on* data X specific to the customer, such as a personal identification number, and data Y specific to the transaction terminal, as described at lines 50-66 of column 3 and lines 16-20 of column 6. Thus, according to that patent, only the signal Z corresponding to the image data is encrypted *using* the data X and Y, and the data X and Y are neither added to the signal Z nor encrypted. In other words, Hamada does not disclose encrypting data generated by combining the data X and Y with the signal Z.

Accordingly, Applicant submits that Hamada does not disclose or suggest at least the feature of encrypting information-added data (i.e., data generated by adding additional information to image data) to make it difficult to detect that the additional information is added, as recited in claim 1. Therefore, Applicant submits that even assuming, *arguendo*, that the teachings of Hamada could properly be combined with those of Usami, the resulting combination would still fail to disclose or suggest at least the above-mentioned feature of Claim 1.

For the foregoing reasons, Applicant submits that independent Claim 1 is patentable over the cited art, whether that art is considered individually or in combination.

Each of independent Claims 17, 19, and 22 also recites the feature of encrypting information-added data, and Applicant submits that those claims are patentable over the cited references for reasons similar to those discussed with respect to Claim 1.

The dependent claims are believed patentable for at least the same reasons as

the independent claims from which they respectively depend, as well as for the additional features those dependent claims recite.

In view of the foregoing, Applicant submits that this application is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are earnestly solicited.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. L. Klock', is written over a horizontal line.

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